

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

Peggy J. Jackson)	
)	
Plaintiff)	
v.)	Civil Action No.: 3:08CV182
)	
United Air Lines, Inc.)	
and)	
Trans States Airlines)	
)	
Defendants.)	

PLAINTIFF'S PRE-TRIAL DISCLOSURES

Now comes the Plaintiff, by counsel, and makes the following Pre-Trial Disclosures to the Defendants as required by the Federal Rules of Civil Procedure and by the Scheduling and Pre-Trial Order entered by this Court.

A. Proposed exhibits

UAL ticket for Flight 282 from Sacramento to Chicago, and United Express
Flight 8042 from Chicago to Richmond
Correspondence from Marie Jackson to UAL 1/15/07
Correspondence from Marie Jackson to UAL 1/31/07
Correspondence from Marie Jackson to UAL 3/11/07
Correspondence from UAL to Marie Jackson 10/17/07
Photographs of Concourse B at RIC 11/13/08
Flight Attendant Pongallo logbook
United Express Agreement between UAL and TSA
Trans State Airlines General Operations Manual

Medical records: Bon Secours Memorial Hospital: 1/5/07
Medical records: VCU Health System (MCV) 1/10/07
Medical records: Henrico Health Care Center 1/10-2/23/07
Medical records: Sutter Tracy Community Hospital 3/19/07
Medical records: San Joaquin General Hospital 4/6/07
Medical records: Valley Care Hospital
Medical records: Valley Care Health System-Legends Facility
Medical records: Hacienda Health Care System 7/17/08-Present

Medical Bills: Bon Secours/VCU/Henrico

Medical Bills: Valley Care/Hacienda Care

B. Proposed Witnesses

Peggy J. Jackson

Marie Jackson

Diane Pongallo, TS flight attendant (by deposition)

Nicole Casian, TSA co-pilot (by deposition)

Dr. April Obier, emergency room, Memorial Regional Hospital

Dr. Aamer A. Syed, resident physician, VCU Health Systems

Dr. A. Mughal, physician, Henrico Health Systems

Dr. C. U. Zachariah, physician, Tracy, CA (by deposition)

Dr. Michael R. Alper, physician, Hacienda Care Center (by deposition)

C. Proposed Stipulations

1. The Plaintiff is a 76 year old widow who now resides at the Hacienda Care Center in Pleasanton, California, under treatment for depression and dementia.
2. She was injured on January 5, 2007 at the Richmond International Airport. She had flown from Sacramento, California to Chicago O'Hare on UAL Flight 282 and from O'Hare to Richmond International on Trans States Airlines Flight 8042.
3. The Plaintiff had requested wheelchair assistance at Chicago O'Hare and at Richmond International Airport. She received wheelchair assistance at Chicago O'Hare but did not receive wheelchair assistance at Richmond.
4. She fell while attempting to walk without assistance from gate B11 on Concourse B to baggage claim.
5. She was taken by paramedics to the emergency room at Bon Secours Memorial Hospital on January 5, 2007 where she was x-rayed and treated for a comminuted fracture of the left shoulder.
6. Thereafter, she was examined and treated at VCU Health Systems (MCV) from January 7, 2007 to January 10, 2007 and at Henrico Health Care Center from January 10, 2007 to February 23, 2007.

Respectfully submitted,

By /s/
Counsel for the Plaintiff

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CERTIFICATE OF FILING AND SERVICE

I hereby certify that on the 17 day of February 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to the following:

/s/ _____
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